

Exhibit 2

From: [Schwartz, Barbara](#)
To: [Christopher Geddis](#); [Priselac, Jessica](#)
Cc: [Adam Slater](#); [Cheryll Calderon](#); [Goldberg, Seth A.](#); [Hansen, Forrest](#); [Bonner, Kelly](#)
Subject: RE: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, No. 1:19-md-02875
Date: Tuesday, February 23, 2021 4:59:27 PM
Attachments: [image001.png](#)

Yes, we can file at 5:15.

Barbara A. Schwartz

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From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Tuesday, February 23, 2021 4:58 PM
To: [Priselac, Jessica <JPriselac@duanemorris.com>](mailto:JPriselac@duanemorris.com)
Cc: [Adam Slater <ASlater@mazieslater.com>](mailto:ASlater@mazieslater.com); [Cheryll Calderon <ccalderon@mazieslater.com>](mailto:ccalderon@mazieslater.com); [Goldberg, Seth A. <SAGoldberg@duanemorris.com>](mailto:SAGoldberg@duanemorris.com); [Hansen, Forrest <FRHansen@duanemorris.com>](mailto:FRHansen@duanemorris.com); [Bonner, Kelly <KABonner@duanemorris.com>](mailto:KABonner@duanemorris.com); [Schwartz, Barbara <BASchwartz@duanemorris.com>](mailto:BASchwartz@duanemorris.com)
Subject: RE: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, No. 1:19-md-02875

We'll redact the letter. Can we file at 5:15? Thanks

From: [Priselac, Jessica <JPriselac@duanemorris.com>](mailto:JPriselac@duanemorris.com)
Sent: Tuesday, February 23, 2021 4:57 PM
To: [Christopher Geddis <CGeddis@mazieslater.com>](mailto:CGeddis@mazieslater.com)
Cc: [Adam Slater <ASlater@mazieslater.com>](mailto:ASlater@mazieslater.com); [Cheryll Calderon <ccalderon@mazieslater.com>](mailto:ccalderon@mazieslater.com); [Goldberg, Seth A. <SAGoldberg@duanemorris.com>](mailto:SAGoldberg@duanemorris.com); [Hansen, Forrest <FRHansen@duanemorris.com>](mailto:FRHansen@duanemorris.com); [Bonner, Kelly <KABonner@duanemorris.com>](mailto:KABonner@duanemorris.com); [Schwartz, Barbara <BASchwartz@duanemorris.com>](mailto:BASchwartz@duanemorris.com)
Subject: RE: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, No. 1:19-md-02875
Importance: High

Chris,

Can you please clarify the statement:

Plaintiffs describe the above document in great detail in their agenda letter, and those descriptions are hereby incorporated into this email. In light of those descriptions, there is nothing about the documents that justifies treatment as confidential under the protective order . . .

If it means you plan to disclose information in the agenda letter that has been marked by one of our clients as confidential or restricted confidential, we object to that information being filed publicly. Doing so without our permission also violates the terms of the protective order. Please redact your agenda letter accordingly.

Jessica Priselac

Attorney at Law

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From: Christopher Geddis <CGeddis@mazieslater.com>

Sent: Tuesday, February 23, 2021 4:48 PM

To: Priselac, Jessica <JPriselac@duanemorris.com>

Cc: Adam Slater <ASlater@mazieslater.com>; Cheryll Calderon <ccalderon@mazieslater.com>;
Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Hansen, Forrest
<FRHansen@duanemorris.com>

Subject: RE: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, No. 1:19-md-02875

Counsel,

Plaintiffs will be relying on the following documents in their agenda letter, which will be filed momentarily:

ZHP00072194
ZHP00120646
ZHP00120313
ZHP00120482
ZHP00063901
ZHP00122869
ZHP00122986
ZHP00122734
ZHP00125610
ZHP00126071
ZHP00137063
ZHP00063956
ZHP00137715
ZHP00139054
ZHP00141038
ZHP00146507.

We understand that you will not be able to assess whether these documents should remain confidential before Plaintiffs' opposition is filed. As a result, we will provide

the documents to the Court for its in camera review.

Plaintiffs describe the above document in great detail in their agenda letter, and those descriptions are hereby incorporated into this email. In light of those descriptions, there is nothing about the documents that justifies treatment as confidential under the protective order, especially given the public health interests involved. Nevertheless, Plaintiffs are available to meet and confer regarding the confidentiality designations of these documents, as required before ZHP's motion to seal pursuant to the protective order.

Best.
Chris

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